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12/11/2006 05:56 PM

To

Subject CRS Site River Elevation and other issues

Ms. Massenburg,

This e-mail contains a preliminary response to the questions and comments in your December 7, 2006 e-mail.

1. You asked for the elevation to the bottom of the East Branch of the Black River adjacent to the CRS Site. The site survey established the elevation of the mean high water mark of the River at 682 feet. This is below the shallow groundwater elevation of 684.5 feet at the River depicted on RI Figure 3-9. The bottom of the river can be calculated using the depth of the River as stated in the Ecological Risk Assessment (Section 2.3.2):

Adjacent to the site, the East Branch is approximately 100 feet wide and the width is fairly stable given the rock-cliff walls that have a "canyon-like" effect. The depth of the East Branch adjacent to the site varies from 2 to 10 feet and the substrate consists primarily of silty clays.

We calculate the elevation of the bottom of the river by subtracting the River depth (2-10 feet) from the mean high water mark (682 feet). Therefore, the elevation of the bottom of the river varies between 672 and 680 feet.

2. You noted that our cost estimate for the Partial Excavation Remedy -- Alternative 6a (submitted on December 4, 2006) changed the parameters from those contained in the most recent Feasibility Study (Revision 3) and did not include the cost of a soil cover for the non-excavated portion of the Site. We used the asphalt cap (FS Alternative 4) because it is the alternative that seems most consistent with expected future site use (industrial storage or parking for the adjacent chemical plant). If you decide to use the soil cap instead, we suggest that you simply subtract from the Alternative 6a Cost Estimate previously provided the difference between FS Alternative 2 (a soil cap) and FS Alternative 4 (an asphalt cap). Based on FS (Revision 3) Table 4.1, the soil cap is roughly \$14,000 less than the asphalt cap. A more detailed and accurate cost analysis for Alternative 6a with a soil cover can be made available.

3. The change in the percentage of hazardous waste in our cost estimate is justified and should be retained in the Alternative 6a Cost Estimate. Alternative 6 (Excavation and Disposal) assumed a minimum of 25% of the soil excavated would need to be disposed of as hazardous waste because excavating the entire site necessarily includes areas of the site where the measured concentrations are relatively low. By contrast, when excavating only the Northwest corner where measured soil concentrations are relatively high, we reasonably anticipate a higher percentage of that soil will need to be disposed of as hazardous waste. We are not increasing the total amount of soil that may be disposed of as hazardous waste; we are just expecting that a larger proportion of the soil excavated from the Northwest Corner will be hazardous. Similarly, on the high side of the range, the same logic justifies increasing the proportion from 75% to 100%. Our cost estimate assumptions for the amount of soil that must be disposed of as hazardous waste under Alternative 6a are valid and should be retained.

This response is preliminary in the sense that it is subject to review and revision by the CRS Site Group members. Two business days is an insufficient time for the Group to prepare a complete formal response to agency questions. However, since this response is a clarification of prior submissions and does not add significant new information, this preliminary response is being provided in advance of formal CRS Site Group review in a good faith attempt to meet your timeline for a response. I will forward revisions, as needed, in the next two weeks.

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